

# EXHIBIT G

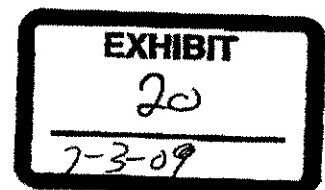
**AFFIDAVIT OF ADESUA OKOSUN**

STATE OF NEW YORK                     )  
  : ss.:  
COUNTY OF NEW YORK                )

Adesua Okosun, being duly sworn, deposes and says:

1. I am an adult female. My date of birth is [REDACTED]
2. My address is [REDACTED]
3. My phone number is [REDACTED]
4. My email address is [REDACTED]
5. I make this affidavit voluntarily, with complete understanding of its contents, knowing that it will be used in legal proceedings, and knowing that I am swearing to the truth of the statements made by me in this affidavit.
6. I was employed by Opia/Deep Blue Group, LLC (the "Company") as a hostess from about May 2004 through May 2006.
7. I was fully qualified for my position and performed well.
8. During my employment, the Company never criticized my job performance.
9. The owners of the Company are Frederick Lesort and Antoine Bleck.
10. Opia is a restaurant/lounge.
11. Information about Opia can be found at [www.opiarestaurant.com](http://www.opiarestaurant.com).

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12. I know Beatriz Veerman and Khadijetou Ba, two former employees (waitresses) of the Company.

13. Ms. Veerman and Ms. Ba were fully qualified for their positions and performed well.

14. During my employment, it was common for women to enter the restaurant and ask me if the restaurant was hiring.

15. Jimena Pereyra, General Manager, was involved in hiring staff.

16. Ms. Pereyra told me that I should look at each female job applicant and, "if she doesn't look like a girl that Frederick would want to sleep with, don't send her to me."

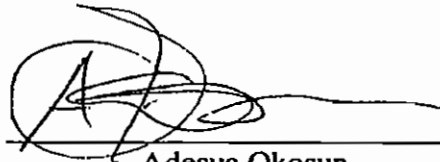
17. During my employment, many waitresses told me that Mr. Lesort or Mr. Bleck repeatedly asked them out and made sexual advances to them, and that their conduct made them feel uncomfortable.

18. For example, Ms. Ba complained to me about Mr. Bleck.

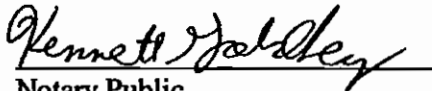
19. She told me, among other items, that he repeatedly asked her out and made sexual advances to her, and that his conduct made her feel uncomfortable.

20. Ms. Ba was clearly not interested in having any romantic or sexual relationship with Mr. Bleck and she told me that she made that clear to Mr. Bleck.

21. In late 2005, Jacque Feischlag, who was a female roommate of mine, was working at Opia in coat check. She told me that she briefly dated Mr. Bleck, who was married at the time.

  
Adesua Okosun

Sworn to before me  
this 13<sup>th</sup> day of November 2007

  
Notary Public

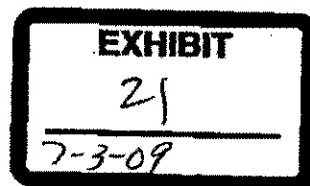
KENNETH A. GOLDBERG  
Notary Public, State of New York  
No: 02GO5061677  
Qualified in New York County  
Commission Expires ~~June 10, 1998~~  
July 27, 2010

**AFFIDAVIT OF DANIELLE DUBOISE**

STATE OF NEW YORK                    )  
  : ss.:  
COUNTY OF NEW YORK                )

Danielle Duboise, being duly sworn, deposes and says:

1. I am an adult female. My address is [REDACTED].  
My phone number is [REDACTED]. My date of birth is [REDACTED]. Thus, I am currently [REDACTED] years old. My email address is [REDACTED].
2. I make this affidavit voluntarily, with complete understanding of its contents, knowing that it will be used in legal proceedings, and knowing that I am swearing to the truth of the statements made by me in this affidavit.
3. I was employed by Opia/Deep Blue Group, LLC (the "Company") as a waitress from about June 2006 through August 2006. I was fully qualified for my position and performed well. During my employment, the Company never criticized my job performance.
4. The owners of the Company are Frederick Lesort and Antoine Bleck. Opia is a restaurant/lounge. For more information, EEOC is referred to [www.opiarestaurant.com](http://www.opiarestaurant.com).
5. During my employment, I was the victim of sexual harassment. Specifically, the owners of the Company encouraged and allowed their male friends/customers to sexually harass me and the owners of the Company required me to give my phone number to those male friends/customers and wanted me to go out on dates with their male friends/customers.
6. I specifically recall that the Company's owners required me to give my phone number to a male friends/customer that is at least 50 years old and is French ("French Male Customer"). The French Male Customer is very friendly with Mr. Bleck, who is also French.



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7. The French Male Customer repeatedly came to the restaurant and made sexual advances to me, all of which were unwelcome and offensive. The Company's owners required me to give my phone number to him and he then began calling me.

8. I did not accept the French Male Customer's calls and did not go out with him. Thereafter, the Company suddenly terminated my employment without any notice or reason. I believe that the Company discharged my employment because I refused to go out with the French Male Customer and declined his sexual advances.

9. I know Beatriz Veerman and Khadijetou Ba, two former employees (waitresses) of the Company. Ms. Veerman and Ms. Ba were fully qualified for their positions and performed well.

10. During my employment, the Company subjected Ms. Veerman and Ms. Ba to the same treatment as I with respect to the Company's owners' male friends/customers.

11. In addition, I witnessed Messrs. Lesort and Bleck personally engage in conduct towards Ms. Veerman and Ms. Ba that I believe constituted sexual harassment against them.

12. For example, during my employment, the waitresses did not need to interact with Messrs. Lesort or Bleck in any meaningful way in order to do their jobs. Messrs. Lesort and Bleck are the owners of Opia and have a staff of management in place to run the restaurant.

13. Nevertheless, Mr. Lesort was overly attentive to Ms. Veerman. In addition, when Mr. Lesort was hosting his male friends/customers, he repeatedly required Ms. Veerman to be his waitress, even though there were other waitresses working the same shift.

14. Similarly, Mr. Bleck was overly attentive to Ms. Ba.
15. Ms. Veerman and Ms. Ba were clearly not interested in having any romantic or sexual relationship with Messrs. Lesort and Bleck.
16. At all times, it was clear to me that Ms. Veerman and Ms. Ba considered the conduct of Messrs. Lesort and Bleck to be unwelcome, offensive and sexual harassment.
17. In fact, Ms. Veerman complained to me about Mr. Lesort.
18. She told me, among other items, that he repeatedly asked her out and made sexual advances to her, and that his conduct made her feel uncomfortable.
19. Mr. Lesort's advances toward Ms. Veerman were clearly unwelcome and offensive to her.
20. To my knowledge, Ms. Veerman and Ms. Ba opposed, objected to and complained about Mr. Lesort's conduct and Mr. Bleck's conduct.
21. During my employment, the Company repeatedly appropriated tip monies and deducted monies from the wages of the waitresses and bartenders. This was documented in tip reports.
22. The Company alleged that it was paying an hourly wage to waitresses. However, I received little or no actual money from the Company in the form of "net pay" hourly wages.
23. I asked for an explanation and the Company said that the monies were being used to pay taxes.

*Danielle Duboise*  
Danielle Duboise

Sworn to before me  
this 6<sup>th</sup> day of November 2007

*Kenneth A. Goldberg*  
Notary Public

KENNETH A. GOLDBERG  
Notary Public, State of New York  
No: 02GO5061677  
Qualified in New York County  
Commission Expires ~~June 10, 2008~~

*July 27, 2010*

**AFFIDAVIT OF JULIE SMITH**

STATE OF NEW YORK )

: ss.:

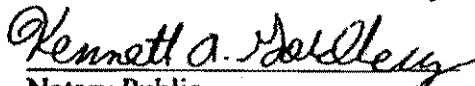
COUNTY OF NEW YORK )

JULIE SMITH, being duly sworn, deposes and says:

1. My name is Julie Smith and my address is [REDACTED], telephone # [REDACTED]. I am an adult female. I make this affidavit voluntarily, with complete understanding of its contents, knowing that it will be used in legal proceedings, and knowing that I am swearing to the truth of the statements made by me in this affidavit. From approximately October 2004 through approximately June/July 2006, I was employed by Opia/Deep Blue Group, LLC (the "Company") as a waitress and bartender.
2. I know Beatriz Veerman and Khadijetou Ba, two former employees (waitresses) of the Company. Ms. Veerman and Ms. Ba were fully qualified for their positions and performed well. I know Frederick Lesort and Antoine Bleck, co-owners of the Company. During my employment with the Company, Ms. Veerman complained to me about Mr. Lesort. She told me, among other items, that he repeatedly asked her out and made her feel uncomfortable. Mr. Lesort's advances toward Ms. Veerman were clearly unwelcome and offensive to her. To my knowledge, Ms. Veerman opposed, objected to and complained about Mr. Lesort's conduct. After Ms. Veerman separated from the Company, she told me that she had been fired.
3. During my employment, the Company repeatedly appropriated tip monies and deducted monies from the wages of the waitresses and bartenders. This was documented in tip reports.

  
Julie Smith

Sworn to before me this 25<sup>th</sup> day of June, 2007

  
Notary Public

KENNETH A. GOLDBERG  
Notary Public, State of New York  
No: 02G05061677  
Qualified in New York County  
Commission Expires ~~June 10, 2009~~  
July 27, 2010

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